OSRO Classification Program Revisions Project
Guidelines Comparison (Old & New)

Current Guidelines	**Proposed Guidelines**
❑ Classification based upon the response times of 3 core elements (Boom, EDRC and TSC).	⇒ Classification based upon the response times of 5 core elements (Boom, EDRC, TSC, Response Vessels, and personnel).
❑ Classification based upon response times to Captain of the Port Cities for entire COTP Zone.	⇒ Classification based upon response times to Oil Pollution Risk Areas (OPRAs) identified for each of the COTP Zones.
❑ Classifications listed as A, B, C, D, and E.	⇒ Classifications listed as A, M, W1, W2, and W3 (AMPD, MMPD, WCD1, WCD2, and WCD3).
❑ Protective Boom requirements listed does not reflect regulations.	⇒ Protective Boom requirements increased to match regulations.
❑ Containment Boom requirements do not reflect recent CAPS increase.	⇒ Containment Boom requirements increased to reflect recent CAPS increase.
❑ A 2:1 requirement for all non-dedicated resources due to availability concerns.	⇒ 2:1 requirement for non-dedicated equipment removed. Replaced with resource site Notification /Mobilization Response Times adjustment (except for barges).
❑ All sites eligible for use to gain classification credit based upon total response time to COTP City.	⇒ Only sites capable of getting underway within 2 hours will be allowed to be counted for classification credit for M, and W1 requirements.
❑ Fixed tankage allowed for TSC credit based upon response time only.	⇒ Fixed tankage will be allowed for up to 35% of Inland, Great Lakes, and Rivers/canals, and not allowed for TSC credit in the Oceans environment.
❑ Vac trucks allowed for EDRC and TSC credit in all environments based upon response times.	⇒ Vac trucks not allowed for TSC and EDRC credit in the Oceans environment, except under certain circumstances.
❑ Response time calculated with each resource site mobilizing immediately upon notification.	⇒ Response time calculated with each resource assigned its own notification/mobilization time, better represents mobilization capability of the resource.
❑ Response times calculated to COTP Cities or an alternate city if requested.	⇒ Response time calculated to the Oil Pollution Risk Areas (OPRAs) or vessel to vessel transfer locations for AMPD.
❑ Response times calculated based on straight-line distance between OSRO site and COTP City.	⇒ Response times calculated based on normal road or water transportation distances between OSRO site and OPRA.
❑ Shallow water capable resource requirements are 10% for offshore and 20% for nearshore, inland, Great Lakes, and rivers/canals environments.	⇒ Shallow water capable resource requirements are 20% for all environments. Also better defining expectations for shallow water equipment.
❑ Exercise compliance not examined.	⇒ Exercise participation must be attested too, documented, and records maintained for review.
❑ Exercise regions not examined.	⇒ Exercise region must be identified.
❑ Training programs looked at for OSHA compliance.	⇒ Training program documented that reflects OSHA requirements and requisite skills training of the OSRO's personnel.
❑ NSFCC coordinates classification.	⇒ NSFCC coordinates classification but consults with the COTP in zones that are requested.
❑ Classification matrix on WWW shows only classifications.	⇒ Classification matrix on the WWW shows owned/contracted quantities.
❑ No "Protective Boom" size criteria.	⇒ Protective Boom criteria implemented for each environment and tier.
❑ Application required submission of core resources and their locations only (includes LOIs).	⇒ Application requirements: site assessment of each resource site (e.g. logistics narrative for each resource site and OPRA; distance to OPRA for each site; number of personnel required to support equipment at each site.)
❑ Attestment statement during application only and continues indefinitely.	⇒ Yearly attestment statement requirement to verify resources.
❑ Require notification of NSFCC and COTP by OSRO when "significant reduction" in capability.	⇒ Clarify and reinforce current requirement and include need to ID backfill for "protracted commitment" of resources.
❑ Shoreline Cleanup classification given based on attestment.	⇒ Shoreline Cleanup classification dropped.